

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY	)	CASE NO. 1:05CV0194
COMMISSION, et al.	)	
	)	
Plaintiff,	)	
	)	
	)	JUDGE GAUGHAN
	)	
CHRIS'S CAFÉ, INC.	)	
	)	
Defendant	)	
	)	JOINT MOTION TO APPROVE
	)	AND ENTER CONSENT DECREE
	)	

The undersigned parties to this action jointly move this Court to approve and enter the attached Consent Decree. In support of this Motion, the parties jointly represent to this Court as follows:

1. The parties are desirous of resolving this controversy without the burden, expense and delay of further litigation;
2. The Court has jurisdiction of the subject matter of this action and of the parties thereto;
3. The parties waive notice, hearing, objection, findings of fact, conclusions of law and right of appeal with regard to the Commission's enforcement action;
4. The policies of Title VII of the Civil Rights Act of 1964, as amended, will be effectuated by entry of the attached Consent Decree;
5. The attached Consent Decree is intended to and does resolve all matters in controversy between the parties;
6. The terms of the attached Consent Decree constitute a fair and equitable settlement of this Action, and the parties hereto agree to be bound thereby.

Granted.  
/s/ Patricia A. Gaughan  
3/30/06

Respectfully submitted,

JAMES L. LEE  
GENERAL COUNSEL

GWENDOLYN YOUNG REAMS  
DEPUTY GENERAL COUNSEL

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION  
1801 L Street N.W.  
Washington, D.C. 20507

/s/ C. Larry Watson  
C. Larry Watson [0031443]  
Associate Regional Attorney

/s/ Donna L. Williams-Alexander  
Donna L. Williams-Alexander [0037838]  
Trial Attorney  
EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION  
CLEVELAND DISTRICT OFFICE  
Anthony J. Celebrezze Federal Building  
1240 East Ninth Street, Suite 3001  
Cleveland, Ohio 44113-1454  
(216)522-7454  
(216)522-7430 fax  
[Donna.Williams-Alexander@eeoc.gov](mailto:Donna.Williams-Alexander@eeoc.gov)

/s/ Dennis J. Niermann  
Dennis J. Niermann [0007988]  
4070 Mayfield Road  
Cleveland, Ohio 44121-3031  
(216) 297-1040  
(216) 291-9622 fax  
[niermann@en.com](mailto:niermann@en.com)

Counsel for Defendant Chris's Café, Inc.

Brian J. Halligan [0024113]  
Halligan & Associates  
930 Claremont Avenue  
P.O. Box 455  
Ashland, Ohio 44805  
(419) 289-2555  
(419) 281-7878 fax  
[bhalligan@halliganandassociates.com](mailto:bhalligan@halliganandassociates.com)  
Counsel for Defendant Chris's Café, Inc.